

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA

Mikhail Cirkunovs v. Zuffa LLC, et al.

Cirkunovs · No. 2:25-cv-00914-RFB-BNW · Decided January 7, 2026

SUMMARY

The United States District Court for the District of Nevada denied without prejudice Plaintiffs’ unopposed motions to seal or redact a status report and a brief concerning an arbitration search-term proposal. The court held that reliance on confidentiality designations under a stipulated protective order, without additional justification under the applicable public-access standard, was insufficient, while temporarily maintaining the filings under seal and setting a deadline for any renewed sealing motions.

CASE DETAILS

COURT	United States District Court for the District of Nevada
JURISDICTION	United States District Court for the District of Nevada
DECIDED	January 7, 2026
DOCKET	2:25-cv-00914-RFB-BNW
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiffs moved to seal or redact a December 2025 status report and a brief concerning an arbitration search-term proposal. The unopposed motions were denied without prejudice.
STANDARD OF REVIEW	The decision whether to seal documents is within the court's discretion; the applicable sealing standard depends on whether the materials are judicial records and whether the motion is dispositive or nondispositive.
PRECEDENTIAL VALUE	Unknown

TOPICS

- civil procedure
- discovery dispute
- commercial litigation

PRACTICE AREAS

- civil procedure
- commercial litigation

QUESTIONS PRESENTED

1. What standard governs requests to seal or redact documents submitted in connection with dispositive or nondispositive motions?
2. Whether plaintiffs established sufficient grounds to seal the status report and arbitration search-term brief based solely on confidentiality designations under a stipulated protective order.

HOLDINGS

1. Judicial records are presumptively accessible to the public, and a party seeking to seal them bears the burden of overcoming the strong presumption of public access.
2. For documents attached to dispositive motions, and for technically nondispositive motions more than tangentially related to the merits, the party seeking to seal must demonstrate compelling reasons supported by specific factual findings that outweigh the public's interest in access.
3. For private materials unearthed during discovery or materials attached to nondispositive motions that are not subject to the full merits-related presumption, the court applies the good-cause standard under Federal Rule of Civil Procedure 26(c).
4. A stipulated protective order or a blanket confidentiality designation, standing alone, does not justify sealing court records or establish that particular documents are secret or confidential.

KEY QUOTATIONS

“Generally, the public has a right to inspect and copy judicial records.” (at 1)

“Stipulated protective orders alone do not justify sealing court records.” (at 2)

“Because judges sign off on these protective orders without making individualized findings, they do not provide a finding that any specific documents are secret or confidential to overcome the presumption of public access.” (at 2)

FACTUAL BACKGROUND

Plaintiffs sought to seal or redact a December 2025 status report and a brief regarding a proposed arbitration search term. The information had been designated confidential under a stipulated protective order, but plaintiffs did not agree with those designations and offered no other reason supporting continued sealing. The court temporarily maintained the documents under seal while allowing either party to file a renewed motion.

PROCEDURAL HISTORY

The plaintiffs filed motions to seal or redact documents submitted in the federal litigation. The District of Nevada denied the motions without prejudice because the plaintiffs relied only on confidentiality designations under a stipulated protective order and provided no independent justification for sealing. The court ordered the documents to remain sealed temporarily pending any renewed motion.

DISPOSITION

other

CASES CITED

- Kamakana v. City & County of Honolulu, 447 F.3d 1172, 1178-79 (9th Cir. 2006)
- Ctr. for Auto Safety v. Chrysler Grp., LLC, 809 F.3d 1092, 1101 (9th Cir. 2016)
- Pintos v. Pac. Creditors Ass'n, 605 F.3d 665, 678-79 (9th Cir. 2010)
- Foltz v. State Farm Mut. Auto. Ins. Co., 331 F.3d 1122, 1133 (9th Cir. 2003)
- Beckman Indus., Inc. v. Int'l Ins. Co., 966 F.2d 470, 475-76 (9th Cir. 1992)

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